

# EXHIBIT A

IN THE CIRCUIT COURT  
OF THE CITY OF VIRGINIA BEACH

SEAN SHALLOW

PLAINTIFF,

CASE# 21-697

VS

LIDL US, LLC et. al.

DEFENDANT.

F11 FD  
CIRCUIT COURT OF VIRGINIA BEACH  
2021 FEB 17 PM 12: 11

TINA E. SHALLOW, CLERK  
3416  
D.C.



JURISDICTION: 16.17-77 - FOR INJURIES DONE TO PERSONAL OR PERSON

JURISDICTION MATTER : GENERAL / INTENTIONAL TORT (INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS) - SLANDER PER SE CRIMINAL ACTIVITY - FASLELY SUMMONING 18.2-461(I)(II) - TITLE II OF CIVIL RIGHTS ACT 2000(a)(c)& (6)(A) PUBLIC ACCOMMODATION - 18 USC 241 CONSPIRACY AGAINST RIGHTS - 18 U.S. Code § 1512(3)(b)(1) - Tampering with a witness, victim, or an informant ( SEE NORFOLK FEDERAL COURT CASE # 2:20-CV-000389). 2.2-3901(C) VIRGINIA HUMAN RIGHTS ACT - 2.2-3904 NONDISCRIMINATION IN PLACES OF PUBLIC ACCOMMODATION - 18 USC 1001 FALSE STATEMENT STATUE. - ADA TITLE III PUBLIC ACCOMMODATION. VIRGINIA CONSTITUTION ARTICLE 1 BILL OF RIGHTS PROHIBITED DISCRIMINATION RACE, COLOR, SEX, NATIONAL ORIGIN.

PRIMA FACIE COMPLAINT

ON 01/21/21 THE PLAINTIFF SEAN SHALLOW WAS SHOPING AT LIDL GROCERY STORE LOCATED 1030 INDEPENDENCE BLVD VIRGINIA BEACH. HE PURCHASE A BOTTLE OF WINE TOTAL COST \$3.13 see exhibit 1. WHILE WAITING TO PAY A BLACK ALLEGED HOMOSEXUAL GAY MALE WEARING LIDL UNIFORM, CLAIMING HE IS THE STORE MANAGER APPROACH THE PLAINTIFF SEAN SHALLOW. HIS COMMENTS WERE THE SAME FROM APPROXIMATELY 2 MONTHS PRIOR. I WOULD LIKE YOU NOT TO COME INTO THIS STORE AGAIN. IN BETWEEN THE 2 MONTHS THE PLAINTIFF SAW THIS SAME BLACK ALLEGEDLY HOMOSEXUAL GAY MALE IN THE LIDL STORE WITH NO PROBLEMS. THE PLAINTIFF IN A LOUD ENOUGH TONE FOR EVERYONE IN THE STORE TO HEAR, MADE FUN OF HIS COMMENT AND TOLD HIM THE ALLEGED PERSON HE IS. LINK TO AL SHARPTON WAS ON TV AGREEING WITH SEAN SHALLOW. ON 01/21/21 THE PLAINTIFF REALIZED THAT HIS SOCIAL MEDIA PLATFORM WAS ALLEGEDLY USED OR HACKED AGAIN WHILE HE WAS ASLEEP 2 TIMES IN THAT WEEK TO PROMOTE HOMOSEXUAL GAY AND OTHER AGENDA WHICH WASN'T HIS VIEWS. THE PLAINTIFF BELIEVE STRONGLY THAT HOMO GAY MEN AND TRANS GENDERS SHOULD NOT BE COMPETING WITH REAL WOMEN OR TRYING TO ELIMINATE OR REPLACE REAL WOMEN. SO ON 01/21/21 HE WAS DISCRIMINATION AT LIDL STORE, FOR BEING A HETEROSEXUAL BLACK MAN WHO WAS PERCEIVED TO BE DISABLED WITH A LOATHSOME DISEASE.

AFTER LEAVING THE STORE RIDING HIS BIKE 3 POLICE / COP CARS VIRGINIA BEACH STOP HIM, AT APPROXIMATELY 700 INDEPENDENCE BLVD IN FRONT OF IMA MEDICAL CENTER. 1 COP PULL THE BOTTLE OF WINE OUT HIS BACK PACK AND STATED "YOU WANT TO GO TO JAIL FOR A BOTTLE OF WINE". THEY CLAIM LIDL MANGER SAME BLACK ALLEGED HOMOSEXUAL GAY MALE STATED " HE STOLE A BOTTLE OF WINE FROM THE STORE". THE PLAINTIFF LOCATED HIS RECEIPT AND SHOWED IT TO THE COPS / POLICE THEY THEN STARTED QUESTIONING THE PLAINTIFF IF HE HAD STOLE A SECOND BOTTLE OF WINE. HE SHOWED THEM THE BOTTLE THE COP / POLICE OFFICER HAD PULL OUT HIS BACK PACK AND TOLD THEM THATS IT THE ONLY BOTTLE OF WINE. ANOTHER OFFICER THEN TRIED TO CONVINCE THE PLAINTIFF TO NOT RETURN TO THAT STORE. THE PLAINTIFF INFORM THE POLICE / COPS HE IS A FREE MAN WHO CAN GO ANY WERE HE WANTS UNDER THE CONSTITUTION AND LAWS THAT GOVERN THE UNITED STATES OF AMERICA.

FOOT NOTE THE PLAINTIFF HAS FACE THIS PATTERN OF DISCRIMINATION IN A FEW STORE IN THE VIRGINIA BEACH AREA, THEY NORMALLY START OFF WITH A COMMENT HIS STEP MOTHER HIS GLORIFY NANY SYLVIA MARLENE SHALLOW LIKES TO USED - THOSE ARE MY PEOPLE AND MY STORE". LIST OF STORES - TARGET PEMBROKE, SEVEN ELEVEN PEMBROKE, & 720 INDEPENDANCE BLVD, STAR BUCK AND NORTHHILL PARKING LOT. WAL-MART 546 FIRST COLONEL RD & DOLLAR TREE STORE 1952 LASKIN RD VIRGINIA BEACH.

#### ARGUMENT

1ST COUNT: SLANDER PER SE CRIMINAL ACTIVITY: (A) THE BLACK MALE - LIDL ALLEGED HOMOSEXUAL GAY STORE MANAGER - FALSELY SUMMONING 18.2-461(I)(II) - THE POLICE & MADE AN INTENTIONAL FALSE STATEMENT (CLASS 1 MISDEMEANOR). (B) THIRD PARTY - THE POLICE OFFICERS BELIEVE THE STATEMENT WAS TRUE. (C) FALSE STATEMENT - THE PLAINTIFF HAD STOLEN A BOTTLE OF WINE FROM LIDL STORE, OFFICER 1 APPROXIMATELY 5, 7 IN HEIGHT WHITE MALE, TOOK THE BOTTLE OF WINE OUT OF THE PLAINTIFF BACK PACK AND THREATEN SEAN SHALLOW WITH IMPRISONMENT. THE PLAINTIFF SHOWED HIS RECEIPT TO THE COPS / POLICE OFFICERS BUT STILL THE POLICE / COP BELIEVED THE FALSE STATEMENT MADE BY THE LIDL ALLEGED BLACK HOMOSEXUAL GAY MANAGER WAS TRUE. OFFICER # 2 WHITE MALE APPROXIMATELY 5, 9 IN HEIGHT CONTINUED TO HARASSED THE PLAINTIFF ASKING HIM ABOUT A PHATOM IMAGINARY 2ND BOTTLE OF WINE. THE POLICE OFFICERS IN VIRGINIA BEACH POLICE CARS THEN LEFT WITHOUT CHARGING THE PLAINTIFF WITH ANY CRIME.

2ND COUNT: DISCRIMINATION (SEX - HETEROSEXUAL MAN), (RACE & COLOR BLACK MULTI RACIAL) NATIONAL ORIGIN - PERMANENT RESIDENT TRINIDAD & TOBAGO - 2.2-3904, NON DISCRIMINATION IN PLACE OF PUBLIC - 2.2-3901(C) VIRGINIA CIVIL RIGHTS ACT - VIRGINIA CONSTITUTION ARTICLE I & TITLE II CIVIL RIGHTS ACT (PUBLIC ACCOMMODATION). AT ALL THE STORE MENTION TO INCLUDE THE DEFENDANT LIDL THE PLAINTIFF SEAN SHALLOW IS BEING DISCRIMINATED BECAUSE HE IS A BLACK MULTIRACIAL HETEROSEXUAL PERMANENT RESIDENT MAN PERCEIVED DISABLE WITH A LOATHSOME DISEASE. IT IS CLEAR THAT THE LAWS AND CONSTITUTION PROHIBIT THESE TYPE OF BEHAVIOR. THE DEFENDANT AFTER THE 1ST TIME GOT A 2ND CHANCE FROM THE PLAINTIFF BUT IT WAS APPARENT THAT LIDL STORE MANAGER ALLEGEDLY HOMO GAY BLACK MALE WAS GOING TO BREAK THE LAW AND VIRGINIA CONSTITUTION; TO FORCE HIS ALLEGED HOMOSEXUAL GAY BELIEFS ON THE PLAINTIFF, AT

THE OTHER STORES LISTED THE SAME GAY HOMOSEXUAL AGENDA WOULD BE FORCE ON THE PLAINTIFF SEAN SHALLOW. HE REJECTS THIS LIFE STYLE BECAUSE OF HIS FREE WILL - PERSONAL AND RELIGIOUS BELIEF, THE PLAINTIFF SEAN SHALLOW WOULD HAVE TO DEAL WITH EXTREME HATE AND DISCRIMINATION.

3RD COUNT: DISCRIMINATION PERCEIVED DISABILITY TITLE III ADA- LOATHSOME DISEASE: INDIVIDUALS WITH DISABILITIES OR IS REGARDED AS HAVING SUCH IMPAIRMENT OR PERCEIVED - ADA GUIDELINES - PUBLIC ACCOMMODATION MUST PROVIDE GOODS & SERVICES IN AN INTERGRATED SETTING. THE PLAINTIFF WAS PERCEIVED AS HAVING A LOATHSOME DISEASE BECAUSE OF HEINOUS DEFORMATION PER SE LOATHSOME DISEASE. SEAN SHALLOW REJECTED HOMOSEXUALITY GAY LIFESTYLE BECAUSE HE IS HETEROSEXUAL BUT IN YEAR 2007-2008 WHILE AT WORK AN ALLEGED STATE POLICE NAME STERLING JOHNSON OR JACKSON LAST NAME WHO IS ALLEGEDLY LINK TO FBI DIRECTOR CHRISTOPHER WRAY. STERLING AT WORK AFTER BEING INFORM SEAN SHALLOW IS NOT A HOMO GAY OR BI-SEAXUAL OR A BINARY MAN, WHILE SEAN SHALLOW THE PLAINTIFF WAS WORKING STANDING IN A WORK AREA, HE WAS ON THE PHONE DEALING WITH THE ORGANIZATION BUSINESS, STERLING WHO WAS POSING AS THE LAB SUPERVISOR TOUCH THE PLAINTIFF PENIS, THE PLAINTIFF JUST LEARNT THATS A SIGNAL FOR HOMO GAY MEN TO HAVE SEX. AFTER HE COMPLAINT A HEINOUS LIE WAS TOLD QUOTE THE PLAINTIFF SAID HE HAS HIV BUT CAMILLE FREDERICK WHO IS LINKED TO SHERIFF DEPTS DIDN'T UNDERSTAND WHAT HE SAID BECAUSE OF HIS ACCENT ( THE PLAINTIFF DO NOT HAVE AN ACCENT). THE SLANDER PER SE WAS DONE TO COVER UP THE HOMO GAY SEX REQUEST. AFTER THAT INCIDENT THERE WAS A WORLD WIDE INVESTIGATION DATING BACK TO HIGH SCHOOL 1990 WHERE THE UNITED STATES / WORLD SPECIAL AGENTS FIRST ATTEMPTED TO TRY AND GIVE THE PLAINTIFF SEAN SHALLOW HERPES 2 - FAILED. THEN 1996 WHILE SERVING IN THE MILITARY AS AN ACTIVE MEDIC SOLDIER THEY ATTEMPTED TO GIVE HIM HIV - FAILED. THE ATTEMPTS THEN CONTINUED UNTIL JUNE 23 2012 WHEN THE DEFENDANT STOP HAVING SEX. THEY ALSO DEFAME THE PLAINTIFF WITH HEINOUS LIES OF GENETAL WARTS AND HEPATITIS C & SYPHILIS. THE REASON THE PLAINTIFF IS NOT ILL WITH THOSE DISEASE IS BECAUSE THE ATTEMPTS WERE STOP BY HIS FATHER. (THE PLAINTIFF IS THE ONLY CHILD OF NICKNAME - GOD, THE DARKNIGHT, BATMAN, WHO IS THE SON OF THE PLAINTIFF GRAND FATHER THE PREVIOUS GOD WHO ONLY HAD 2 MALE CHILDREN).

WHILE THIS INVESTIGATION FOR PERCEIVED DISABILITY CONTINUED THE PLAINTIFF WAS DISCRIMINATE IN PUBLIC ACCOMMODATION, TOLD NOT TO COME BACK AND USED THERE REST ROOM, CLAIM THEY HAD CAMERAS IN THE REST ROOM WATCHING HIM & WOULD ASK HIM TO PULL BACK HIS FORESKIN ON HIS PENIS, SO THEY CAN SEE INSIDE HIS FORSKIN AREA OF HIS PENIS.. See case number 2:20-cv-000389

4th COUNT:CONSPIRACY AGAINST RIGHTS 18 USC 241 IF 2 OR MORE PERSONS CONSPIRE TO INJURE ( FOOD POISONING & TAMPERING WITH CONSUMER PRODUCTS THE PLAINTIFF CONSUM OR <sup>And</sup> PURCHASE <sup>Food</sup> CAUSING MINOR INJURIES) ALSO OPPRESS HIM BY (KEEP HIM FROM OBTAINING EMPLOYMENT AT HIS PAY SCALE OR IN THE MEDICAL FILED) THREATEN OR INTIMIDATE ( DO NOT COME BACK INTO LIDL STORE OTHERWISE THE BLACK ALLEGED HOMO GAY MANAGER TOLD HIM HE IS GOING TO CALL THE COP / POLICE SAME AT SEVEN ELEVEN, DOLLAR TREE, TARGET & POLICE COPS WERE CALL AT NORTHHILL ASKING HIM TO LEAVE.) ANY PERSON IN THE COMMONWEALTH, PLAINTIFF SEAN SHALLOW IN FREE EXERCISE OR ENJOYMENT OF ANY RIGHTS OR PRIVILEGE SECURED TO HIM BY THE

CONSTITUTION OR LAWS OF THE UNITED STATES OR BECAUSE OF HIS HAVING SO EXERCISE THE SAME. ( IN THIS CASE WE HAVE THE LIDL ALLEGED HOMO GAY BLACK MALE MANAGER VIOLATING THE LAW AND CONSTITUTION BECAUSE THE PLAINTIFF EXERCISE HIS RIGHT TO FREEDOM OF SPEECH, HE IS NOT HOMOSEXUAL GAY AND DO NOT WANT HIS SOCIAL MEDIA PLATFORM OR SONGS REJECT HATE OR HIS MUSIC VIDEO WE NEED CHANGE REMIX USED TO PROMOTE A HOMOSEXUAL GAY AGENDA, ITS NOT MADE FOR THAT ITS TO PROMOTE ALL UNDER PRIVILEGED HUMANS. HIS FREE WIL BELIEF THAT RELIGIOUS INSTITUTIONS SHOULD ALLOW HOMO GAYS TO WORSHIP BUT EVERY OTHER HUMAN IN THE WORLD, HAVE FREE WILL TO PRACTICE THEIR BELIEF EVEN IF ITS NOT THE SAME BELIEF. THE DAYS THE PLAINTIFF POSTED HIS FREE WILL BELIEFS ON HIS SOCIAL MEDIA IS THE DAYS HE WAS DISCRIMINATED AND HAD HIS RIGHT DEPRIVED IN THOSE PUBLIC ACCOMMODATION. 18 USC 1512 (3)(B)(1).  
TAMPERING WITH A WITNESS & VICTIM - WHOEVER KNOWINGLY USES INTIMIDATION OR ATTEMPTS TO DO SO OR ENGAGES IN MISLEADING CONDUCT TOWARDS ANOTHER PERSON WITH INTENT TO - INFLUENCE, DELAY OR PREVENT THE TESTIMONY OF ANY PERSON IN AN OFFICIAL PROCEEDING - SEE CASE # 2:20-CV-000389, ALLEGEDLY UNITED STATES AGENCIES EMPLOYEES U.S. RANGERS AND OR FBI AGENTS AND OR METROPOLITAN P.D. NYPD AND OTHERS WHO ARE TRYING TO GET THAT CASE DISMISS OR DELAYED ARE INVOLVED WITH THIS INCIDENT. IF THE LIDL BLACK ALLEGED HOMO GAY MALE MADE THE DEFAMING STATEMENT TO THE POLICE AND ANY OF THE RESPONDING COPS WERE FEDERAL AGENTS 18 USC 1001 FALSE STATEMENT STATUTE.

FOOTNOTE THE BLACK ALLEGED HOMO GAY LIDL MANAGER AT THE TIME IS WEARING LIDL UNIFORM AND IDENTIFICATION TAG AS AN EMPLOYEE HE IS AT THE TIME OF INCIDENT A REPRESENTATIVE IN AN OFFICIAL CAPACITY OF LIDL LLC MAKING LIDL U.S LLC LIABLE.

5TH COUNT GENERAL / INTENTIONAL TORT IIED. IN THIS CASE THE DEFENDANT LIDL ALLEGED HOMO / GAY MANAGER ACT WAS OUTRAGEOUS TO CAUSE INTENTIONAL EMOTION DISTRESS.  
EMBARRASSMENT BEING QUESTION ON THE SIDE WALK OF A BUSY STREET, ATTEMPTED FALSE IMPRISONMENT, KEEP THE PLAINTIFF FROM OBTAIN ANY EMPLOYMENT, COULD POSSIBLY LOSE HIS LEGAL IMMIGRATION STATUS AND FORFEIT ANY MONEY HE WOULD BE PAID IN A SETTLEMENT OR COURT ORDER JUDGMENT FROM CASE # 2:20-CV-000389 NORFOLK FEDERAL COURT. THE DEFENDANT ACTS IS WITH HATE AND MALICE BECAUSE OF THE PLAINTIFF RACE MULTIRACIAL - COLOR BLACK - SEX OR GENDER MALE - SEXUAL IDENTITY HETEROSEXUAL, - NATIONAL ORIGIN. PERMANET RESIDENT DISABLE VETERAN & PERCEIVED DISABILITY LOATHSOME DISEASE.

#### DEMAND

RELIEF MONETARY DAMAGES FOR GENERAL / INTENTIONAL TORT DISCRIMINATION SLANDER PER SE CRIMINAL ACTIVITY VIOLATION OF STATE LAWS AND CONSTITUTION FILE WITHIN THE STATUE OF LIMITATION. FOR ALL CONCURRENT ACTS THE PLAINTIFF IS SEEK MAX 49800 USD, FILING & PRINITING COST145 USD & AN INVESIGATION FROM THE VIRGINIA DOJ WHY THIS PATTERN OF VIOLATION IS PERPETUATED.

*Total 49945.00 USD*

RESPECTFULLY SUBMITTED,

SEAN SHALLOW PLAINTIFF

/s/ SEAN SHALLOW

P.O. BOX 61884

VIRGINIA BEACH, VB 23466

DEFENDANT

LIDL U.S. LLC

3500 S. CLARK ST

ARLINGTON, VA 22203

*SEAN SHALLOW*  
DATED 2/17/21